



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 19 2016

ASSISTANT ADMINISTRATOR  
FOR ENFORCEMENT AND  
COMPLIANCE ASSURANCE

Lori P. Miller  
Senior Staff Officer  
National Center for Animal Health Emergency Management  
Veterinary Services  
Animal and Plant Health Inspection Service  
U.S. Department of Agriculture  
4700 River Road, Unit 41  
Riverdale, MD 20737-1238

**Subject:** EPA comments on the Final Programmatic Environmental Impact Statement (PEIS) for Carcass Management During a Mass Animal Health Emergency (CEQ# 20150356)

Dear Ms. Miller:

In accordance with our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act (CAA), EPA has reviewed the above referenced document developed by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS) on *Carcass Management During a Mass Animal Health Emergency*.

The Final PEIS proposes a nationwide plan for managing carcasses in the event of a mass animal health emergency, defined in the PEIS as a natural disaster or a biological, chemical, and/or radiological event generating 50 tons of carcasses or more. Site-specific Environmental Assessments will be tiered to this programmatic EIS.

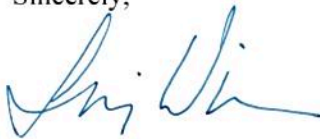
The Final PEIS analyzes three carcass management alternatives that could be implemented during a mass animal health emergency and used to support mass animal health emergency planning and decision-making. APHIS selected the *Adaptive Management Alternative* as the preferred alternative in the PEIS. This alternative will provide greater flexibility in carcass management. Program decision-makers could use any carcass management technologies at or near the location of the mass animal health emergency, with a preference for standard procedures (landfills compliant with the Resource Conservation and Recovery Act, rendering, and/or fixed-facility incineration compliant with CAA, and composting) over no action procedures (open-air burning and unlined burial). This alternative also allows the use of nonstandard options such as alkaline hydrolysis, anaerobic digestion, microwave sterilization, and gasification. Carcass management options would be used either singly or in combination with each other.

In a letter dated October 30, 2015, EPA rated the Draft PEIS as *Environmental Concerns – Insufficient Information (EC-2)*. Our concerns centered around three areas: 1) providing more information on potential impacts from the unlined burial pit and open air burning options in the preferred alternative; 2) clarifying how the 50 ton weight threshold for a mass animal health emergency was determined; and 3) expanding the climate change analysis to include increased frequency and intensity of weather events. Based on our review of the Final PEIS, the concerns indicated in the October 30, 2015 letter have been addressed as contained in APHIS's response to our comments in Appendix H of the Final PEIS. We have no objections to the preferred alternative.

As APHIS develops the Record of Decision, we suggest that you consider including information about on-line tools and other state or Federal agency information livestock managers could use to help determine if soils in their specific area would be suitable for unlined burial (e.g., soil characteristics, water table depth, precipitation rates, etc.).

Please feel free to contact me or have your staff contact Karin Leff, Acting Director, NEPA Compliance Division, at (202) 564-7068 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shari Wilson', with a stylized flourish at the end.

Shari Wilson  
Acting Director  
Office of Federal Activities